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9	UNITED STATES DISTRICT COURT	
10	DISTRICT OF NEVADA	
11	THE BUREAU FASHION WEEK LLC, a	
12	South Carolina Limited Liability Company;	Case No.: 2:24-cv-00233-GMN-EJY
13	THE SOCIETY FASHION WEEK LLC, a South Carolina Limited Liability Company;	JOINT DISCOVERY PLAN AND SCHEDULING ORDER
14	Plaintiffs, Cross-Defendants	SCHEDCER (G ORDER
15	vs.	
16	NATALIYA NOVA LLC, a Nevada Limited Liability Company;	
17	Defendant, Counter-Claimant	
18		
19		
20	PLAINTIFFS/COUNTER-DEFENDANTS THE BUREAU FASHION WEEK LLC, a	
21	South Carolina limited liability company, doing business as The Bureau, and THE SOCIETY	
22	FASHION WEEK LLC, a South Carolina limited liability company, doing business as The	
23	Society (collectively, "Plaintiffs") and DEFENDANT/COUNTER-CLAIMANT NATALIYA	
24	NOVA LLC, a Nevada limited liability company ("Defendant"; collectively with Plaintiffs, the	
25	"Parties"), by and through their respective undersigned counsel, hereby stipulate and agree to the	
26	following Discovery Plan and Scheduling Order in this matter pursuant to FRCP 26(f) and Local	
27	Rule 26-1.	

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I. Information Required by FRCP 26(a)

A. Rule 26(f) Conference.

On June 06, 2024, counsel for the Parties held and concluded the Rule 26(f) conference as required by FRCP 26(f) and Local Rule 26-1. Louise Jillian Paris of Omni Legal Group, participated on behalf of Plaintiffs; and Roman Nikhman of Nikhman Law Firm PLLC, participated on behalf of Defendant.

B. Rule 26(a) Disclosures.

The Parties will exchange their "initial disclosures" required by FRCP 26(a) on or before June 20, 2024, within fourteen (14) days of their Rule 26(f) Conference.

C. Scope and Timing of Discovery.

The Parties agree discovery should extend to the full extent allowed by the Federal Rules of Civil Procedure and that discovery should not be limited to any particular issues.

- i. Discovery Cut-Off Date: Defendant first appeared in this matter with the filing of its Answer and Counterclaim before this Court on April 16, 2024.
 Accordingly, the close of discovery shall occur on October 7, 2024.
- ii. Amending the Pleadings and Adding Parties: All motions to amend the pleadings or add parties shall be filed no later than July 10, 2024, 90 days prior to the close of discovery.
- iii. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts): Disclosures concerning experts shall be made no later than August 8, 2024, 60 days before the discovery cut-ff date. Disclosures concerning rebuttal experts shall occur no later than September 9, 2024, 30 days after the initial disclosure of experts.
- iv. **Dispositive Motions:** The deadline for filing dispositive motions shall be **November 7, 2024**, 30 days after the discovery cut-off date.
- v. Pretrial Orders: The deadline for the joint pretrial order is December 9,2024, 30 days after the dispositive motion deadline.

D. Electronically Stored Information.

The Parties do not anticipate any unusual issues with respect to the disclosure or discovery of electronically stored information. The Parties agree that an ESI order is not necessary and agree to follow the procedures outlined below with regard to electronic discovery or ESI:

- Besides Excel and PowerPoint files, all ESI will be produced in TIFF or PDF form created directly from the electronic file and each party agrees to maintain the native files without modification.
- 2. To the extent the produced ESI is kept in the ordinary course of business, the production shall be accompanied by its metadata, which shall include Custodian, Email Subject, From, Author, Recipient (s), including CC and CC receipts of an email, Date Created, Date Last Modified, and Date Sent and/or Received, File Extension, Attachment Range, Attachment Begin, and Attachment End (or the equivalent thereof), to the extent such metadata exist.
- 3. Either party may request production or inspection of any original document and the producing party shall make all reasonable efforts to accommodate that request. The parties reserve the right to object to producing ESI that is not reasonably accessible, or which would be unduly burdensome or costly to produce, or should not be produced for other reasons.
- 4. Excel and PowerPoint files will be produced in native format. If a party needs to redact a portion of an Excel spreadsheet, the parties will meet and confer regarding the production of the document in an image file format. Any native files produced will be renamed with a production number. TIFF image "placeholders" with production numbers corresponding to each Excel or PowerPoint file will be utilized in the productions with appropriate native links provided in producing party's load file.

5. The mere production of ESI in litigation as part of a mass production shall not itself constitute a waiver for any purpose.

The parties agree that discovery requests and responses will be served electronically, forwarding a copy to each of the following e-mail addresses:

For Plaintiffs:	For Defendant:
Omid E. Khalifeh	Roman Nikhman
omid@omnilg.com	esq@nikhman.com
Louise Jillian Paris	
jillian@omnilg.com	
Krista Albregts	
kalbregts@albregtslaw.com	

In addition, the parties also agree that physical products, or any other discovery production that cannot be served electronically, will be served by Federal Express or other registered mail.

The parties reserve the right to pursue discovery on other issues as permitted under the Federal Rules of Civil Procedure and this Court's Local Rules.

E. Claims of Privilege or Protection.

None at this time.

Changes to Limitations on Discovery

The Parties do not anticipate any changes to the discovery limitations set forth in the Federal Rules of Civil Procedure or the Court's Local Rules at this time, with each party reserving all rights to make an application to the Court in the event that discovery becomes unduly burdensome or disproportional to the case.

F. Motions 1 The parties do not currently plan to move to add other parties or to transfer venue. 2 Furthermore, if subsequent facts are discovered requiring additional parties or amendment of 3 pleadings, the parties will seek leave of Court accordingly. 4 5 The Parties may move for judgment on the pleadings and/or summary judgment/adjudication if supported by law, facts, and evidence obtained through discovery. 6 7 G. Other Orders. On May 28, 2024, Plaintiffs filed a Motion to Dismiss Counterclaim for Failure To State 8 9 A Claim Under Rule 12(b)(6). See ECF. No. 27. As of June 14, 2024, the foregoing Motion 10 currently remains pending before this Court. On June 10, 2024, Defendant filed its Response to Plaintiffs' Motion to Dismiss (ECF No. 29). 11 12 H. Alternative Dispute Resolution / Alternative Forms of Case Disposition. The Parties certify that they have met and conferred regarding about the possibility of 13 using alternative dispute-resolution processes including mediation, arbitration, and if applicable, 14 15 early neutral evaluation, and considered consent to trial by a magistrate judge under 28 U.S.C. § 636(c). 16 17 **ORDER** 18 19 IT IS SO ORDERED. 20 Dated: June 14, 2024 21 22 Dated: June 14, 2024. 23 **OMNI LEGAL GROUP NIKHMAN LAW FIRM PLLC** 24 25 By: /s/ Omid E. Khalifeh By: /s/ Roman Nikhman 26 **OMNI LEGAL GROUP** Roman Nikhman, Esq. Omid E. Khalifeh, Bar No. 26730 Nevada Bar No. 15444 27 Email: omid@omnilg.com 3960 Howard Hughes Pkwy, Suite 500

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